

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

IN THE MATTER OF:

**Illinois Cement Company
1601 Rockwell Road
LaSalle, Illinois 61301**

ATTENTION:

**Brian McCallum
Regulatory Manager**

Request to Provide Information Pursuant to the Clean Air Act

The U.S. Environmental Protection Agency is requiring Illinois Cement Company (Illinois Cement or you) to submit certain information about the facility at 1601 Rockwell Road, LaSalle, Illinois (the Facility). Appendix A provides the instructions needed to answer this information request, including instructions for electronic submissions. Appendix B specifies the information that you must submit. You must send this information to us within 30 calendar days after you receive this request.

We are issuing this information request under Section 114(a) of the Clean Air Act (the CAA), 42 U.S.C. § 7414(a). Section 114(a) authorizes the Administrator of EPA to require the submission of information. The Administrator has delegated this authority to the Director of the Air and Radiation Division, Region 5.

Illinois Cement owns and operates an emission source at the LaSalle, Illinois facility. We are requesting this information to determine whether your emission source is complying with the Illinois State Implementation Plan and the CAA.

Illinois Cement must send all required information to:

Attn: Compliance Tracker, AE-18J
Air Enforcement and Compliance Assurance Branch
U.S. Environmental Protection Agency
Region 5
77 W. Jackson Boulevard
Chicago, Illinois 60604

Illinois Cement must submit all required information under an authorized signature with the following certification:

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Clean Air Act and 18 U.S.C. §§ 1001 and 1341.

As explained more fully in Appendix C, you may assert a claim of business confidentiality under 40 C.F.R. Part 2, Subpart B for any part of the information you submit to us. Information subject to a business confidentiality claim is available to the public only to the extent, and by means of the procedures, set forth at 40 C.F.R. Part 2, Subpart B. If you do not assert a business confidentiality claim when you submit the information, EPA may make this information available to the public without further notice. You should be aware, moreover, that pursuant to Section 114(c) of the CAA and 40 C.F.R. § 2.301(a) and (f), emissions data, standards and limitations are not entitled to confidential treatment and shall be made available to the public notwithstanding any assertion of a business confidentiality claim. Appendix C provides additional information regarding the meaning and scope of the term "emissions data."


This information request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 *et seq.*, because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

We may use any information submitted in response to this request in an administrative, civil or criminal action.

Failure to comply fully with this information request may subject Illinois Cement to an enforcement action under Section 113 of the CAA, 42 U.S.C. § 7413.

You should direct any questions about this information request to Kenneth Ruffatto at (312) 886-7886 or Scott Connolly at (312) 886-1493.

3/6/17
Date



Edward Nam
Director
Air and Radiation Division

Appendix A

When providing the information requested in Appendix B, use the following instructions and definitions.

Instructions

1. Provide a separate narrative response to each question and subpart of a question set forth in Appendix B.
2. Precede each answer with the number of the question to which it corresponds and, at the end of each answer, identify the person(s) who provided information used or considered in responding to that question, as well as each person consulted in the preparation of that response.
3. Indicate on each document produced, or in some other reasonable manner, the number of the question to which it corresponds.
4. When a response is provided in the form of a number, specify the units of measure of the number in a precise manner.
5. Where information or documents necessary for a response are neither in your possession nor available to you, indicate in your response why the information or documents are not available or in your possession, and identify any source that either possesses or is likely to possess the documents or information.
6. If information not known or not available to you as of the date of submission later becomes known or available to you, you must supplement your response. Moreover, should you find at any time after the submission of your response that any portion of the submitted information is false or incorrect, you must notify EPA as soon as possible.

Electronic Submissions

To aid in our electronic recordkeeping efforts, we request that you provide all documents responsive to this information request in an electronic format according to paragraphs 1 through 6, below. These submissions are in lieu of hard copy.

1. Provide all responsive documents in Portable Document Format (PDF) or similar format, unless otherwise requested in specific questions. If the PDFs are scanned images, perform at least Optical Character Recognition (OCR) for "image over text" to allow the document to be searchable. Submitters providing secured PDFs should also provide unsecured versions for EPA use in repurposing text.
2. When specific questions request data in electronic spreadsheet form, provide the data and corresponding information in editable Excel or Lotus format, and not in image format. If Excel or Lotus formats are not available, then the format should allow for data to be used in calculations by a standard spreadsheet program such as Excel or Lotus.

3. Provide submission on physical media such as compact disk, flash drive or other similar item.
4. Provide a table of contents for each compact disk or flash drive containing electronic documents submitted in response to our request so that each document can be accurately identified in relation to your response to a specific question. *We recommend the use of electronic file folders organized by question number.* In addition, each compact disk or flash drive should be labeled appropriately (e.g., Company Name, Disk 1 of 4 for Information Request Response, Date of Response).
5. Documents claimed as confidential business information (CBI) must be submitted on separate disks/drives apart from the non-confidential information. This will facilitate appropriate records management and appropriate handling and protection of the CBI. Please follow the instructions in Appendix C for designating information as CBI.
6. Certify that the attached files have been scanned for viruses and indicate what program was used.

Definitions

All terms used in this information request have their ordinary meaning unless such terms are defined in the CAA, 42 U.S.C. §§ 7401 *et seq.*, or the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Portland Cement Product at 40 C.F.R. Part 63, Subpart LLL.

1. The terms “document” and “documents” shall mean any object that records, stores, or presents information, and includes writings, memoranda, records, or information of any kind, formal or informal, whether wholly or partially handwritten or typed, whether in computer format, memory, or storage device, or in hardcopy, including any form or format of these. If in computer format or memory, each such document shall be provided in translation to a form useable and readable by EPA, with all necessary documentation and support. All documents in hard copy should also include attachments to or enclosures with any documents.
2. The term “NO_x” shall mean nitrogen oxides which include all oxides of nitrogen except nitrous oxide,
3. The term “operating day” means a 24-hour period beginning at 12:00 midnight during which the kiln produces clinker at any time. For calculating 30 day rolling average emissions, an operating day does not include the hours of operation during startup or shutdown.
4. The term “PSD/NSR” shall mean the Prevention of Significant Deterioration and the New Source Review preconstruction permitting programs established at CAA subparts C and D and further defined at 40 C.F.R. Parts 51 and 52 and any respective program established under a state implementation plan.

5. The term "Rolling average" means the weighted average of all data collected during the applicable averaging period. The period of a rolling average stipulates the frequency of data averaging and reporting. To demonstrate compliance with an operating parameter a 30-day rolling average period requires calculation of a new average value each operating day and shall include the average of all the hourly averages of the specific operating parameter. For demonstration of compliance with an emissions limit based on pollutant concentration, a 30-day rolling average is comprised of the average of all the hourly average concentrations over the previous 30 operating days. For demonstration of compliance with an emissions limit based on pounds-pollutant per production unit, the 30-day rolling average is calculated by summing the hourly mass emissions over the previous 30 operating days, then dividing that sum by the total production during the same period.

Appendix B

Information You Are Required to Submit to EPA

Illinois Cement must submit the following information about its LaSalle Facility (the Facility) pursuant to Section 114(a) of the CAA, 42 U.S.C. § 7414(a), within 30 days of receiving this request.

1. Provide a narrative describing the methods used for the annual emissions calculations and all documents outlining procedures for calculating annual emissions. Include monthly emission summary spreadsheets for 2014, 2015, and 2016.
2. Provide all emissions tests conducted for any reason, from June 8, 2016, to the present, and provide copies of all emissions test reports. Emission testing includes, but is not limited to, compliance testing, engineering testing, stack testing, capture efficiency testing, and testing for general information. Also include all emissions tests used to establish current operating limits. Provide full stack test reports, including the summary pages, the section describing the process parameters and production or processing rates at the time of the test, all test runs, and all calculations.
3. For all fuels burned at the facility, provide a spreadsheet containing monthly fuel usage for the kiln and the precalciner, from June 1, 2011, to the present. Differentiate how much fuel was used in the precalciner versus the kiln during each month.
4. Provide all permits and permit applications for the projects listed below that were provided in response to Request #4 of EPA's Section 114 Information Request issued on June 8, 2016. If Illinois Cement did not apply for a permit and/or one was not issued, please indicate that in your response and state the rationale used, with supporting documentation, to determine if permitting was or wasn't necessary.
 - a. Selective non-catalytic reduction (SNCR) – NO_x reduction system;
 - b. Kiln stack replacement;
 - c. Loesche (Raw) mill rebuild;
 - d. Replace stage III & IV thimbles;
 - e. 441 heat exchanger duct repair;
 - f. 485 and 422 B/H bags and refurbishment;
 - g. New raw mill bypass duct;
 - h. New cooler heat exchanger;
 - i. 481 raw mill fan motor;
 - j. Calciner burner modification;
 - k. NESHAP monitoring equipment; and
 - l. NESHAP DAS system.

5. For each project identified in Request #4, provide:
 - a. A detailed description of the work performed, including reasoning and justification for the project;
 - b. An analysis and quantification of the effect of the change on the production and/or emissions from the unit;
 - c. Whether the Facility considered it a major modification for PSD or NSR purposes;
 - d. All assumptions, emission factors and calculations utilized in making the determination that the modification was or was not a major modification;
 - e. Any and all correspondence, studies or reports related to such analyses;
 - f. The basis for the Facility's determination that the change was or was not a major modification for each pollutant;
 - g. Copies of any and all best available control technology (BACT) and lowest achievable emission rate (LAER) analyses (performed by the Facility, any State/federal agency, or any consultant or contractor) related to any emission unit at the Facility for any of the changes in the table; and
 - h. Any and all correspondence, studies or reports related to such BACT or LAER determinations.
6. Provide design documents related to the SNCR unit that was approved for construction on September 18, 2009 and completed in December 2011. Design documents should include process diagram of equipment, specifications and operations and maintenance manuals. Include projected and actual NO_x emissions reduction capacity of the SNCR unit.
7. Provide a spreadsheet of logs and records of ammonia flow rates from the SNCR into the kiln exhaust, from January 1, 2012 to the present. Indicate whether the kiln is being operated in preheater-precalciner kiln or only as a preheater kiln.
8. Provide a diagram of the kiln system that indicates the current and all previous ammonia injection locations.
9. Provide logs of continuous parametric NO_x concentration monitoring data, installed downstream of SNCR system, as required by Condition 6 of Construction Permit 09090010, issued on September 8, 2009. Also include volumetric air flow rate monitoring data (in dscfm) and process rate (in tons clinker) that corresponds with NO_x concentrations data.
10. Provide all 30-day rolling average calculations performed for NO_x and sulfur dioxide emissions at the Facility since January 1, 2012.
11. Provide copies of all NO_x emission calculations and reports since January 1, 2007. Include in your response any annual emission reports, all rolling averages and monthly emission summaries that have not already been provided.

12. Provide documents related to the outages that occurred in and around the following dates at the LaSalle facility. Include in your response a detailed description of work or maintenance performed, cost of work or maintenance, and dates any work or maintenance was initiated and completed.
 - a. April 9 to 30, 2016;
 - b. April 4 to 27, 2015;
 - c. March 18 to April 25, 2014;
 - d. March 31 to May 6, 2013; and
 - e. March 17 to May 23, 2012.
13. Provide a spreadsheet of kiln Total Hydrocarbon (THC) daily averages calculated from December 12, 2016 to the present.
14. Provide a spreadsheet of kiln THC 30-day rolling averages calculated from January 1, 2012 to the present.

Appendix C

Confidential Business and Personal Privacy Information

Assertion Requirements

You may assert a business confidentiality claim covering any parts of the information requested in the attached Appendix B, as provided in 40 C.F.R. § 2.203(b).

Emission data provided under Section 114 of the CAA, 42 U.S.C. § 7414, is not entitled to confidential treatment under 40 C.F.R. Part 2.

“Emission data” means, with reference to any source of emissions of any substance into the air:

Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of any emission which has been emitted by the source (or of any pollutant resulting from any emission by the source), or any combination of the foregoing;

Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of the emissions which, under an applicable standard or limitation, the source was authorized to emit (including to the extent necessary for such purposes, a description of the manner and rate of operation of the source); and

A general description of the location and/or nature of the source to the extent necessary to identify the source and to distinguish it from other sources (including, to the extent necessary for such purposes, a description of the device, installation, or operation constituting the source).

40 C.F.R. § 2.301(a)(2)(i)(A), (B) and (C).

To make a confidentiality claim, submit the requested information and indicate that you are making a claim of confidentiality. Any document for which you make a claim of confidentiality should be marked by attaching a cover sheet stamped or typed with a caption or other suitable form of notice to indicate the intent to claim confidentiality. The stamped or typed caption or other suitable form of notice should employ language such as “trade secret” or “proprietary” or “company confidential” and indicate a date, if any, when the information should no longer be treated as confidential. Information covered by such a claim will be disclosed by EPA only to the extent permitted and by means of the procedures set forth at Section 114(c) of the CAA and 40 C.F.R. Part 2. Allegedly confidential portions of otherwise non-confidential documents should be clearly identified. EPA will construe the failure to furnish a confidentiality claim with your response to the information request as a waiver of that claim, and the information may be made available to the public without further notice to you.

Determining Whether the Information Is Entitled to Confidential Treatment

All confidentiality claims are subject to EPA verification and must be made in accordance with 40 C.F.R. § 2.208, which provides in part that you must satisfactorily show: that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so, that the information is not and has not been reasonably obtainable by legitimate means without your consent and that disclosure of the information is likely to cause substantial harm to your business's competitive position.

Pursuant to 40 C.F.R. Part 2, Subpart B, EPA may at any time send you a letter asking that you support your confidential business information (CBI) claim. If you receive such a letter, you must respond within the number of days specified by EPA. Failure to submit your comments within that time would be regarded as a waiver of your confidentiality claim or claims, and EPA may release the information. If you receive such a letter, EPA will ask you to specify which portions of the information you consider confidential by page, paragraph and sentence. Any information not specifically identified as subject to a confidentiality claim may be disclosed to the requestor without further notice to you. For each item or class of information that you identify as being CBI, EPA will ask that you answer the following questions, giving as much detail as possible:

1. For what period of time do you request that the information be maintained as confidential, e.g., until a certain date, until the occurrence of a special event or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, please specify that event.
2. Information submitted to EPA becomes stale over time. Why should the information you claim as confidential be protected for the time period specified in your answer to question number 1?
3. What measures have you taken to protect the information claimed as confidential? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If so, why should the information still be considered confidential?
4. Is the information contained in any publicly available databases, promotional publications, annual reports or articles? Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?
5. Has any governmental body made a determination as to confidentiality of the information? If so, please attach a copy of the determination.
6. For each category of information claimed as confidential, explain with specificity why release of the information is likely to cause substantial harm to your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as

substantial and the causal relationship between disclosure and such harmful effects. How could your competitors make use of this information to your detriment?

7. Do you assert that the information is submitted on a voluntary or a mandatory basis? Please explain the reason for your assertion. If you assert that the information is voluntarily submitted information, explain whether and why disclosure of the information would tend to lessen the availability to EPA of similar information in the future.
8. Is there any other information you deem relevant to EPA's determination regarding your claim of business confidentiality?

If you receive a request for a substantiation letter from the EPA, you bear the burden of substantiating your confidentiality claim. Conclusory allegations will be given little or no weight in the determination. In substantiating your CBI claim(s), you must bracket all text so claimed and mark it "CBI." Information so designated will be disclosed by EPA only to the extent allowed by and by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. If you fail to claim the information as confidential, it may be made available to the public without further notice to you.

Personal Privacy Information

Please segregate any personnel, medical and similar files from your responses and include that information on a separate sheet(s) marked as "Personal Privacy Information." Disclosure of such information to the general public may constitute an invasion of privacy.

CERTIFICATE OF MAILING


I certify that I sent a Request to Provide Information Pursuant to the Clean Air Act by
Certified Mail, Return Receipt Requested, to:

Brian McCallum
Illinois Cement Company
1601 Rockwell Road
LaSalle, Illinois 61301

I also certify that I sent a copy of the Request to Provide Information Pursuant to the
Clean Air Act by E-mail to:

Yasmine Keppner-Bauman
Acting Manager, Compliance Section, Bureau of Air
Yasmine.keppner-bauman@illinois.gov

On the 7 day of March 2017.

 for

Kathy Jones, Program Technician
AECAB, PAS

CERTIFIED MAIL RECEIPT NUMBER: 7014 2870 0001 9578 9183